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Attorneys for Defendants The Church of Jesus Christ of Latter-day Saints and Courtney Willden.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

CYNTHIA V. WASHINGTON,

Plaintiff,

vs.

CORPORATION OF THE PRESIDING
BISHOP OF THE CHURCH OF JESUS
CHRIST OF LATTER-DAY SAINTS,
JOHN DOES I THROUGH X, and
COURTNEY WILLDEN,

Defendant.

Case No. 3:20-cv-_____

NOTICE OF REMOVAL

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

This notice of defendant The Church of Jesus Christ of Latter-day Saints,
respectfully shows:

1. That on the 9th day of April, 2020, an action was commenced in the Superior Court for the State of Alaska Third Judicial District of Anchorage, entitled *Cynthia Washington v. Corporation of the Presiding Bishop of the Church of Jesus Christ of Latter-Day-Saints, John Does I Through X, Doe Corporations I through X, and Courtney Willden*, Case No. 3AN-20-05897 Civil. While plaintiff's complaint does not specify the exact amount in controversy, by virtue of filing in the Superior Court for the State of Alaska, the amount in controversy is at least \$100,000. Therefore, the amount in controversy is more than \$75,000, exclusive of interest, costs and fees.

2. That this notice of removal is being filed pursuant to Title 28, United States Code § 1446(a) and (b) within thirty (30) days after receipt by defendant The Church of Jesus Christ of Latter-day Saints, of the Summons and Complaint in the above-referenced action. Service of the Summons was accomplished on April 16, 2020.

3. This court has original jurisdiction of this action pursuant to Title 28, U.S.C. Section 1332(a), and this action may be removed to United States District Court pursuant to Title 28, U.S.C. Section 1441 and Section 1446(b), in that it is a civil action, the sum in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the parties to this lawsuit.

4. On information and belief, at the time this action was commenced, Plaintiff was a resident of Alaska as alleged in the Complaint.

5. At the time this action was commenced, defendant The Church of Jesus Christ of Latter-day Saints, was, and is, a corporation incorporated and existing under the laws of the State of Utah, with its principal place of business in the State of Utah, and is therefore deemed to be a citizen of Utah.

6. At the time this action was commenced, defendant Courtney Willden was, and is, a citizen of the State of Arizona. Ms. Willden consents to the removal of this matter to the District Court for the District of Alaska.

7. Pursuant to 28 U.S.C. § 1441(a), the citizenship of defendants sued under fictitious names is disregarded for the purposes of removal. Therefore, the citizenship of John Does I through X is irrelevant to this removal petition.

8. Defendant The Church of Jesus Christ of Latter-day Saints will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE defendant The Church of Jesus Christ of Latter-day Saints gives notice that this action formerly pending in the Superior Court for the State of Alaska, Third Judicial District at Anchorage is hereby removed to this court.

DATED at Anchorage, Alaska, this 6th day of May, 2020.

HUGHES WHITE COLBO WILCOX
AND TERVOOREN, LLC
Attorneys for Defendant The Church of
Jesus Christ of Latter-day Saints.

By: s/Kimberlee A. Colbo
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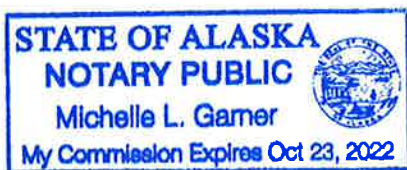
VERIFICATION


STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

Kimberlee A. Colbo, being first duly sworn, deposes and states that she is one of the attorneys for The Church of Jesus Christ of Latter-day Saints, defendant above named; that she knows the contents of this notice of removal and that the same are true and accurate to the best of her knowledge and belief; and that she voluntarily executed the foregoing notice of removal and was fully authorized to do so on behalf of The Church of Jesus Christ of Latter-day Saints.


Kimberlee A. Colbo

SUBSCRIBED AND SWORN TO before me this 6th day of May,
2020.




Notary Public in and for Alaska
My commission expires: October 23, 2022

I hereby certify that a true and correct copy
of the foregoing was served via the court's
ECF system on the 6th day of May, 2020 on:

David Murrills
Schlehofer Law Offices, P.C.
2900 Boniface parkway, Suite 200
Anchorage, AK 99504

s/Kimberlee A. Colbo